

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA**

**RANDY WALKER,**

**Case No.:**

**Plaintiff,**

**v.**

**NORTH SEWICKLEY POLICE DEPARTMENT,**

**RICK PATTON, LORI GEIST, and**

**RIVERSIDE BEAVER COUNTY SCHOOL DISTRICT**

**Defendants.**

**COMPLAINT**

**I. INTRODUCTION**

Plaintiff, Randy Walker, brings this action against Defendants, North Sewickley Police Department and Rick Patton and Lori Geist and Riverside Beaver County School District for violations of his right to privacy. This action arises from the unlawful release and distribution of an incident report, causing significant harm to Plaintiff's personal and professional life. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 and § 1343.

**II. PARTIES**

**1. Plaintiff:**

Randy Walker, an adult individual residing at 317 Leila Street, Johnstown, PA 15905.

**2. Defendants:**

3. North Sewickley Police Department, located at 899 Mercer Rd, Beaver Falls, PA 15010.
4. Rick Patton, employee at 318 Country Club Dr., Ellwood City, PA 16117.
5. Lori Geist, employee at 318 Country Club Dr., Ellwood City, PA 16117.
6. Riverside Beaver County School District, located at 318 Country Club Dr., Ellwood City, PA 16117.

**III. JURISDICTION AND VENUE**

7. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the action arises under federal law. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because the events giving rise to the claims occurred in this district, and the Defendants conduct business in this district.

**IV. FACTUAL ALLEGATIONS**

8. Plaintiff submitted several Right-to-Know requests to the Riverside Beaver County School District, which were partially denied.
9. The North Sewickley Police Department unlawfully released an incident report containing sensitive personal information about Plaintiff.

10. The incident report was released to Lori Geist through a FOIA request on October 23, 2024.

11. The report was subsequently distributed by at least two individuals, as evidenced by different handwritings on the envelopes.

12. The report was sent to Plaintiff's elderly parents, ex-wife, and various members of the community and school board members at the Conemaugh Township Area School District causing significant distress and harm.

13. Plaintiff experienced emotional distress due to the unlawful release and distribution of the incident report.

14. Plaintiff's elderly parents were concerned for their safety, and his ex-wife feared the impact on their children.

15. The incident report damaged Plaintiff's professional image, affecting his current employment and future career prospects.

16. Plaintiff's name and photo were removed from his employer's social media, and he faced difficulties in negotiating salary and seeking new positions.

17. The Riverside Beaver County School District's response to Plaintiff's Right-to-Know requests and harassment reports was inadequate, failing to address the privacy violations and harassment incidents effectively.

## **V. CLAIMS FOR RELIEF**

### **Count I: Violation of Right to Privacy**

18. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 10 as though fully set forth herein. The Defendants violated Plaintiff's right to privacy by unlawfully releasing and distributing the incident report. This action caused significant harm to Plaintiff's personal and professional life, including emotional distress, damage to professional reputation, and negative impacts on family relationships.

19. The incident report was sent to Plaintiff's elderly parents, ex-wife, and various members of the community and board members of the Conemaugh Township Area School District causing significant distress and harm. Plaintiff experienced emotional distress due to the unlawful release and distribution of the incident report. Plaintiff's elderly parents were concerned for their safety, and his ex-wife feared the impact on their children.

20. The incident report damaged Plaintiff's professional image, affecting his current employment and future career prospects. Plaintiff's name and photo were removed from his employer's social media, and he faced difficulties in negotiating salary and seeking new positions. The Riverside Beaver County School District's response to Plaintiff's Right-to-Know requests and harassment reports was insufficient, failing to effectively address the privacy violations and harassment incidents.

#### **Application to Parties:**

**21. North Sewickley Police Department:** Unlawfully released the incident report containing sensitive personal information about Randy Walker.

**22. Rick Patton:** Involved in the release and distribution of the incident report.

**23. Lori Geist:** Received the incident report through a FOIA request and contributed to its distribution.

**24. Riverside Beaver County School District:** Failed to adequately address the privacy violations and harassment incidents reported by Randy Walker.

**Count II: Invasion of Privacy**

25. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 10 as though fully set forth herein. The actions of the Defendants constitute an invasion of privacy, causing significant harm to Plaintiff's personal and professional life. The unlawful release and distribution of the incident report led to emotional distress, damage to Plaintiff's reputation, and negative impacts on family relationships.

26. The incident report was sent to Plaintiff's elderly parents, ex-wife, and various members of the community board members of the Conemaugh Township Area School District causing significant distress and harm. Plaintiff experienced emotional distress due to the unlawful release and distribution of the incident report. Plaintiff's elderly parents were anxious for their safety, and his ex-wife was worried about the impact on their children.

27. The incident report damaged Plaintiff's professional reputation, affecting both current employment and future career prospects. Plaintiff's name and photo were taken down from the employer's social media, resulting in difficulties negotiating salary and obtaining new positions. The Riverside Beaver County School District's response to Plaintiff's Right-to-Know requests and harassment reports was inadequate, failing to address the privacy violations and harassment incidents effectively.

28. The invasion of privacy had a profound impact on Plaintiff's mental health, leading to anxiety, depression, and a sense of helplessness. Plaintiff's relationships with family members

were strained, as they were also affected by the distressing information contained in the incident report. The emotional toll on Plaintiff's elderly parents was particularly severe, as they feared for their safety and well-being.

29. Plaintiff's ex-wife was also deeply affected, fearing the impact on their children and the potential for further harassment. Professionally, the incident report caused significant damage to Plaintiff's reputation. Plaintiff's name and photo were removed from his employer's social media, signaling a loss of trust and confidence from his employer.

30. This had a direct impact on Plaintiff's current employment, as he faced difficulties in negotiating salary and seeking new positions. The incident report also impacted Plaintiff's future career prospects, as potential employers were likely to view the information contained in the report negatively. The Riverside Beaver County School District's inadequate response to Plaintiff's Right-to-Know requests and harassment reports further exacerbated the situation.

31. The failure to address the privacy violations and harassment incidents effectively left Plaintiff feeling unsupported and vulnerable. This lack of response contributed to Plaintiff's emotional distress and sense of helplessness, as he felt that his concerns were not being taken seriously.

32. In summary, the invasion of privacy caused significant harm to Plaintiff's personal and professional life, leading to emotional distress, damage to reputation, and negative impacts on family relationships. The actions of the Defendants had far-reaching consequences, affecting Plaintiff's mental health, professional image, and overall well-being.

**Application to Parties:**

**33. North Sewickley Police Department:** Released the incident report, intruding into Randy Walker's private affairs.

**34. Rick Patton:** Participated in the distribution of the incident report, further invading Randy Walker's privacy.

**35. Lori Geist:** Distributed the incident report, causing harm to Randy Walker's personal and professional life.

**36. Riverside Beaver County School District:** Inadequately responded to the privacy violations, contributing to the harm experienced by Randy Walker.

### **Count III: Negligence**

37. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 10 as though fully set forth herein. The Defendants were negligent in their handling of the incident report, failing to take reasonable steps to protect Plaintiff's sensitive personal information. This negligence resulted in the unlawful release and distribution of the incident report, causing significant harm to Plaintiff.

38. The incident report was distributed to Plaintiff's elderly parents, ex-wife, and various members of the community and the board members of the Conemaugh Township Area School District resulting in significant distress and harm. Plaintiff suffered emotional distress as a consequence of the unlawful release and dissemination of the incident report.

39. Plaintiff's elderly parents were concerned for their safety, and his ex-wife feared the impact on their children. The incident report harmed the Plaintiff's professional image, adversely affecting his current job and hindering future career opportunities.

40. Plaintiff's personal information was removed from his employer's social media, and he faced difficulties in negotiating salary and seeking new positions. The Riverside Beaver County School District's response to Plaintiff's Right-to-Know requests and harassment reports was inadequate, failing to address the privacy violations and harassment incidents effectively.

41. The negligence of the Defendants had a profound impact on Plaintiff's mental health, leading to anxiety, depression, and a sense of helplessness. Plaintiff's relationships with family members were strained, as they were also affected by the distressing information contained in the incident report.

42. The emotional toll on Plaintiff's elderly parents was particularly severe, as they feared for their safety and well-being. Plaintiff's ex-wife was also deeply affected, fearing the impact on their children and the potential for further harassment. Professionally, the incident report caused significant damage to Plaintiff's reputation.

43. Plaintiff's name and photo were removed from his employer's social media, resulting in a direct impact on Plaintiff's current employment. Plaintiff faced challenges in negotiating salary and seeking new positions.

44. The incident report also affected Plaintiff's future career prospects, as potential employers were likely to view the information contained in the report negatively. The Riverside Beaver County School District's inadequate response to Plaintiff's Right-to-Know requests and harassment reports further exacerbated the situation.

45. The failure to address the privacy violations and harassment incidents effectively left Plaintiff feeling unsupported and vulnerable. The Plaintiff's emotional distress and sense of



helplessness were exacerbated by the lack of response, as he felt his concerns were not being taken seriously.

46. In essence, the negligence of the Defendants caused significant harm to Plaintiff's personal and professional life, leading to emotional distress, damage to reputation, and negative impacts on family relationships. The Defendant's actions had extensive repercussions, impacting the Plaintiff's mental health, professional reputation, and overall well-being.

#### **Application to Parties:**

**47. North Sewickley Police Department:** Had a duty to protect Randy Walker's sensitive personal information and breached that duty by releasing the incident report.

**48. Rick Patton:** Breached the duty of care by participating in the release and distribution of the incident report.

**49. Lori Geist:** Contributed to the breach of duty by distributing the incident report.

**50. Riverside Beaver County School District:** Failed to take reasonable steps to protect Randy Walker's privacy and adequately address the harassment incidents.

#### **COUNT IV- DEFAMATION & SLANDER**

51. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 14 as if more fully set forth herein.

52. Defendants made defamatory communications concerning Plaintiff.

53. Defendants distributed a police report containing Plaintiff's personal information to various individuals and entities, including Plaintiff's parents, ex-wife, community members, and 17

school board members.

54. Defendants wrote to the superintendent of Plaintiff's employing school district, stating that Plaintiff was unstable and should not work around children

55. Defendants published the defamatory communications.

56. Defendants sent copies of the police report to multiple recipients, including Plaintiff's parents, ex-wife, community members, and 17 school board members.

57. Defendants sent a written communication to the superintendent of Plaintiff's employing school district.

58. The defamatory communications applied to Plaintiff.

59. The police report contained Plaintiff's personal information, including driver's license and social security number.

60. The communication to the superintendent specifically referred to Plaintiff and Plaintiff's employment.

61. The recipients understood the defamatory meaning of the communications.

62. The recipients of the police report would have understood that the release of such personal information was improper and potentially harmful to Plaintiff.

63. The superintendent would have understood that describing Plaintiff as "unstable" and unfit to work around children was harmful to Plaintiff's reputation and employment.

64. The recipients understood that the defamatory communications were intended to be applied to Plaintiff.

65. The police report contained Plaintiff's personal information, clearly identifying Plaintiff as the subject.

66. The communication to the superintendent explicitly referred to Plaintiff and Plaintiff's employment at the school district.

67. Plaintiff suffered special harm as a result of the publication of the defamatory

communications.

68. The distribution of Plaintiff's personal information, including driver's license and social security number, exposed Plaintiff to potential identity theft and other harm.

69. The communication to the superintendent jeopardized Plaintiff's employment and professional reputation.

70. Defendants abused any conditionally privileged occasion that may have existed.

71. The police report was related to a case that was never prosecuted and should not have been released, indicating that Defendants did not have a legitimate reason to obtain or distribute the report.

72. Defendants' statement to the superintendent that Plaintiff was unstable and unfit to work with children was not based on any legitimate or verified information.

#### **Application to Parties**

**73. Lori Geist-**Committed Defamation and Slander by publishing unverified and false information.

**74. Rick Patton-**Committed Defamation and Slander by publishing unverified and false information.

## **VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Randy Walker respectfully requests that this Court: A. Enter judgment in favor of Plaintiff and against Defendants on all counts; B. Award Plaintiff compensatory and punitive damages in an amount to be determined at trial or settlement; C. Award Plaintiff back pay, front pay, and benefits; D. Award Plaintiff reasonable attorney's fees and costs; E. Grant such other and further relief as this Court deems just and proper.

## **VII. JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

*Sharon L. Wigle, Esq.*

Sharon L. Wigle, Esq.

Sharon Lawruler L.L.C

471 Hill Churches Rd

Latrobe, PA 15650

724-420-0937

[Sharon@Lawruler.onmicrosoft.com](mailto:Sharon@Lawruler.onmicrosoft.com)

PA I.D. 59964

Dated: 30 January 2025

### VERIFICATION

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A & 4904, relating to unsworn falsification to authorities.

Signature Date:  \_\_\_\_\_  
DocuSigned by:  
A5839CF7B8BF4B9

2/5/2025

Name: Randy walker

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within Complaint was served upon all counsel of record/and/or parties of record via Service by Electronic Service and/or US

Marshall as follows:

North Sewickley Police Department

899 Mercer Rd, Beaver Falls, PA 15010

Rick Patton, employee at 318 Country Club Dr., Ellwood City, PA 16117

Lori Geist, employee at 318 Country Club Dr., Ellwood City, PA 16117

Riverside Beaver County School District,

318 Country Club Dr., Ellwood City, PA 16117

Respectfully Submitted,

*Sharon L. Wigle, Esq.*

Sharon L. Wigle, Esq.